

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AVANIR PHARMACEUTICALS, INC.,)	
AVANIR HOLDING COMPANY, and)	
CENTER FOR NEUROLOGIC STUDY,)	
)	
Plaintiffs,)	C.A. No. 11-704 (LPS)
)	CONSOLIDATED
v.)	
)	
ACTAVIS SOUTH ATLANTIC LLC,)	
ACTAVIS LLC, PAR PHARMACEUTICAL,)	
INC., PAR PHARMACEUTICAL)	
COMPANIES, INC., IMPAX)	
LABORATORIES, INC., WOCKHARDT,)	
LTD., WOCKHARDT USA, LLC, WATSON)	
PHARMACEUTICALS, INC., WATSON)	
LABORATORIES, INC., and WATSON)	
PHARMA, INC.,)	
)	
Defendants.)	

**[PROPOSED] STIPULATION AND ORDER SUBSTITUTING
SANDOZ INC. FOR THE WATSON DEFENDANTS**

WHEREAS Defendants Watson Pharmaceuticals, Inc., Watson Laboratories, Inc., and Watson Pharma Inc. (collectively, the “Watson Defendants”) filed a motion to substitute third-party Sandoz Inc. (“Sandoz”) for the Watson Defendants pursuant to Fed. R. Civ. P. 25(c) on January 23, 2013 (D.I. 299);

WHEREAS Plaintiffs Avanir Pharmaceuticals, Inc., Avanir Holding Company and Center for Neurologic Study (collectively, “Plaintiffs”) opposed the Watson Defendants’ motion to substitute on February 11, 2013 (D.I. 311);

WHEREAS Plaintiffs and Sandoz have resolved any potential disputes that could be brought against one another in C.A. No. 11-704-LPS (Consolidated) in the event that the Court were to grant the Watson Defendants’ motion to substitute; and

WHEREAS Plaintiffs and the Watson Defendants jointly seek to have the Court grant the Watson Defendants' motion to substitute for the purpose of allowing Plaintiffs and Sandoz to effectuate their settlement, without prejudice to Plaintiffs' right to oppose substitution if the settlement is not effectuated;

IT IS HEREBY STIPULATED by Plaintiffs and the Watson Defendants, subject to the approval of the Court, as follows:

(1) The motion to substitute Sandoz for the Watson Defendants (D.I. 299) is granted.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

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SO ORDERED this ____ day of August 2013.

J.